



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 8, 2020

BY ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Stephen M. Calk*, 19 Cr. 366 (LGS)

Dear Judge Schofield:

The Government respectfully writes to advise the Court that its review of additional recently discovered materials from the Special Counsel's Office ("SCO"), as described in its letters of August 7, 2020 (Dkt. 96), September 9 (Dkt. 100), October 9 (Dkt. 110), and November 9 (Dkt. 129) (the "Discovery Review Letters"), is now complete. Since the Government's November 9 letter, the Government undertook a comparison process that involved an automated process of document comparison and then a manual analysis of the results. This process, which was intended to double check our manual review of the same materials, led us to identify approximately eleven additional documents, which we produced to the defense today. We have not identified any additional nonduplicative discoverable material through this review.

Accordingly, we have completed our review of our discovery productions described in our Discovery Review Letters and our productions pursuant to that review. Of course, as we have previously noted (*see, e.g.*, Dkt. 74 at 25), should we in the course of preparing for trial come into possession of or become aware of any other potentially discoverable material—of which the Government is not presently aware—we will produce it promptly.

Respectfully submitted,

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cc: Counsel of Record (via ECF)